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October 12, 2001

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, Massachusetts 02110

Re: D.T.E. 01-63 – Supplemental Reply Comments of NSTAR Electric

Dear Ms. Cottrell:

On September 28, 2001, Commonwealth Electric Company, d/b/a NSTAR Electric ("NSTAR Electric" or the "Company") filed with the Department of Telecommunications and Energy (the "Department") Reply Comments in the above-referenced proceeding. The Company submits these Supplemental Reply Comments to respond briefly to the Cape Light Compact's (the "Compact") Reply Comments filed on October 2, 2001; and the joint comments filed by the Office of the Attorney General (the "Attorney General") and the Division of Energy Resources (the "DOER") filed on October 2, 2001 and October 4, 2001 (the "AG/DOER Joint Reply Comments"). Both the Compact's Reply Comments and the AG/DOER's Joint Reply Comments were filed pursuant to a Motion for Extension of Time to File Reply Comments requested by the Compact and granted by the Department on September 28, 2001.

As noted in its Reply Comments, the Company supports the concept of the Compact's Default Service Pilot Plan (the "Pilot Plan") and will work with the Compact to ensure its efficient implementation, if approved. However, in addition, the Company expresses its support for the AG/DOER Joint Comments, particularly as they relate to: (1) support for Department approval of any supply contract for the Pilot Plan entered into by the Compact with a competitive supplier; and (2) the rights of all parties to pursue adjudicatory procedures in this matter, if necessary. Regarding the former, the Company needs regulatory assurance that the Pilot Plan can be implemented as approved prior to the Company committing

resources to alter its systems to accommodate the enrollment of customers into the Pilot Plan. Accordingly, Department approval of the Company's supply contract, once filed, is a condition precedent to the Company's commencement of effort to implement the Pilot Plan. Regarding the second issue, the Company agrees with the Attorney General and the DOER that the Compact cannot appropriate presumptuously adjudicatory rights at the Department for itself, only. Although neither the Company nor any other party has requested adjudicatory hearings in this proceeding, the Company will be substantially and specifically affected by the Pilot Plan and would therefore have the procedural rights and protections inter alia of G.L c. 30A, § 11.

The Company appreciates the opportunity to supplement its Reply Comments.

Sincerely,



John Cope-Flanagan

cc: Jeanne L. Voveris, Hearing Officer
Kevin Penders, Hearing Officer
Ronald LeComte, Director, Electric Power Division
George Dean, Foley Hoag
Service List, D.T.E. 01-63